

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE**

NATIONAL SALVAGE &
SERVICE CORPORATION,

Plaintiff,

v.

SULA VALLEY BIOGAS, SA DE
C.V., AND HONDURAN GREEN
POWER CORPORATION,

Defendants.

C.A. No. 22-1428-TMH

JURY TRIAL DEMANDED

**APPLICATION FOR CLERK’S ENTRY
OF DEFAULT AGAINST DEFENDANTS**

Plaintiff, National Salvage & Service Corporation, (“NSSC” or “Seller”), pursuant to Rule 55(a) of the Federal Rules of Civil Procedure, hereby requests that the Clerk of the United States District Court for the District of Delaware enter a default against Defendants, Sula Valley Biogas, SA de C.V. (“Sula Valley”) and Honduran Green Power Corporation (“HGPC”) for their failure to plead or otherwise respond in this action. This Application is supported by the Declaration of Christopher Fitzpatrick Cannataro, Esq., attached hereto as Exhibit A.

This application is properly before this Court. The Court has subject-matter jurisdiction over this action pursuant to 28 U.S.C. § 1332(a)(1). The Court has personal jurisdiction over Defendants by consent of the parties under their Sale of Goods Agreement.

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Dated: January 20, 2023

/s/ Christopher Fitzpatrick Cannataro

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